

**APPEAL NO. 23-4509 (L); CROSS APPEAL NO. 23-4566**

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**IN THE UNITED STATES COURT OF APPEALS  
FOR THE FOURTH CIRCUIT**

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**UNITED STATES OF AMERICA .....*Plaintiff-Appellee/Cross-Appellant,***

***Versus***

**RUSSELL LAFFITTE.....*Defendant-Appellant/Cross-Appellee.***

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**MOTION TO FILE CORRECTED REDACTED  
OPENING AND RESPONSE BRIEF**

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COMES NOW Appellee/Cross-Appellant United States of America, through its undersigned counsel and in accordance with Fourth Circuit Local Rule 32(c), and hereby moves this Honorable Court for an Order granting leave to file a Corrected Redacted Opening and Response Brief. In support of this motion, the United States makes the following showing:

1. The United States filed its Opening and Response Brief on Friday, March 22, 2024.
2. As required by Local Rule 25(c)(3)(B), two versions of the Government's Brief were filed: a complete version under seal and a redacted version of the same document for the public file.

3. Despite best efforts to comply with this Court's Local Rules and the district court's sealing orders, after filing, the undersigned counsel realized additional portions of the Redacted Opening and Response Brief need to be redacted.
4. The additional redactions will be to exhibits reproduced on pages 13 and 14 of the Redacted Opening and Response Brief.<sup>1</sup>
5. No substantive changes are requested, and no changes to the Sealed Opening and Response Brief are necessary.
6. The undersigned has consulted with counsel for Laffitte to obtain consent to the filing of a Corrected Redacted Opening and Response Brief but, as of the filing of this motion, has not received a response.

WHEREFORE, Appellee respectfully requests that this Court issue an Order granting leave to file a corrected copy of the Opening and Response Brief.

**[SIGNATURE BLOCK FOLLOWING]**

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<sup>1</sup> These exhibits were correctly redacted in the Joint Appendix. The error is the Government's.

Respectfully submitted,

ADAIR F. BOROUGHS  
UNITED STATES ATTORNEY

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March 25, 2024